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*Attorneys for Defendants LG Electronics U.S.A.,
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Corporation*
**Pro hac vice forthcoming*

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

JOHN HERNANDEZ, et al., and on
behalf of all others similarly situated

Plaintiffs,

vs.

LG ELECTRONICS U.S.A., Inc., et al.

Defendants.

Case No. 2:22-cv-08813-SVW-JEM

Hon. Stephen V. Wilson

**DEFENDANT LG ELECTRONICS
U.S.A., INC.'S NOTICE OF
MOTION AND MOTION TO
COMPEL ARBITRATION**

**[Memorandum of Points and
Authorities, Declaration of William
Kwon, and [Proposed] Order Filed
Concurrently Herewith]**

9 U.S.C. § 1 *et seq.*

Date: Monday, August 14, 2023
Time: 1:30 PM
Location: Courtroom 10A

1 **NOTICE OF MOTION AND MOTION**

2 **TO PLAINTIFFS AND THEIR ATTORNEYS OF RECORD:**

3 **PLEASE TAKE NOTICE** that, on August 14, 2023, or as soon thereafter as
4 the matter may be heard in Courtroom 10A of the United States District Court for
5 the Central District of California, located at 350 W. 1st Street, Los Angeles,
6 California, 90012, defendant LG Electronics USA, Inc. (“Defendant” or “LG”) will,
7 and hereby does, move the Court for an order staying this case and compelling the
8 Parties to arbitrate this dispute through individual arbitration. This Motion is made
9 pursuant to the Federal Arbitration Act, 9 U.S.C. § 1 *et seq.*, on the grounds that this
10 dispute is subject to a valid arbitration agreement. Staying Plaintiff’s claims so that
11 the Parties may resolve this dispute through individual arbitration would effectuate
12 that agreement, and would also serve the interests of justice and promote judicial
13 economy.

14 This Motion is based on this Notice of Motion and Motion, the accompanying
15 Memorandum of Points and Authorities, the accompanying Declaration of William
16 Kwon, the pleadings, records, and files in this action, and any argument that the
17 Court may entertain at any hearing on this matter. Further, this Motion is made
18 following pre-filing meet and confers between counsel for the Parties, which took
19 place on March 29, 2023 and May 26, 2023. Specifically, counsel for LG discussed
20 with counsel for Plaintiffs the basis for LG’s motion to compel arbitration. The
21 parties were unable to resolve the issues identified by LG’s Motion.
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1 Dated: June 2, 2023

By: /s/ Vassi Iliadis

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21 *BestBuy.Com, LLC; Best Buy Stores, L.P.;*
22 *and Costco Wholesale Corporation*
23 **Pro hac vice forthcoming*

PRE-FILING MEET AND CONFER CERTIFICATION

I certify, pursuant to Local Rule 7-3, that counsel for Defendant LG Electronics USA, Inc. met and conferred with counsel for Plaintiffs on March 29, 2023 and May 26, 2023, to discuss LG's above Motion. Counsel for LG discussed with counsel for Plaintiffs the basis for LG's motion to compel arbitration. Despite counsels' best efforts, no pre-filing resolution has been reached and all meet and confer efforts have been exhausted.

Respectfully submitted,

Dated: June 2, 2023

By: /s/ Vassi Iliadis

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